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COMPLAINT

(for non-prisoner filers without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Steven R. Brown

v.

Case Number:

22-cv-1217

(Full name of defendant(s))

Fiserv, Inc.

TeleCheck Services, Inc.

TRS Recovery Services, Inc.

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of West Virginia and resides at
(State)

211 Grant Ave #203A, Morgantown, W. Va 26505-4933
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Fiserv, Inc.
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)
and (if a person) resides at —
(Address, if known)
and (if the defendant harmed you while doing the defendant's job)
worked for —
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

See attached page

Plaintiff Steven R. Brown resides in Morgantown, WV, and is an adult citizen of the United States and the State of West Virginia.

Defendant Fiserv, Inc. is incorporated in Brookfield, WI, within the jurisdiction of the State of Wisconsin and the United States District Court for the Eastern District of Wisconsin.

Defendant TeleCheck Services, Inc. is incorporated in the State of Delaware, and is a wholly-owned subsidiary of Defendant Fiserv, Inc. Its head office is located at 1600 Terrell Mill Road, Marietta, GA 30067.

Defendant TRS Recovery Services, Inc. is incorporated in the State of Colorado, and is a wholly-owned subsidiary of Defendant Fiserv, Inc. Its head office is located at 1600 Terrell Mill Road, Marietta, GA 30067. TRS Recovery Services is marketed on its website as a service of First Data Corporation, a component of Fiserv Inc. since 29 July 2019, and links on the TRS website refer users to the website of Fiserv, Inc.

Plaintiff's checking account (*5965) was initially charged one-hundred eighty-five dollars in June 2022 by Lyft, Inc. for services not authorized or rendered. Lyft, Inc. agreed via electronic mail to reverse this charge, but then made two other charges for one-hundred eighty-five dollars each, which they also agreed to reverse. Only one of the three charges was reversed. Lyft, Inc. directed Plaintiff to dispute the remaining two charges with his bank, the United Services Automobile Association (USAA), located in the State of Texas. Plaintiff Brown filed two disputes for these charges, which were resolved by USAA in his favor after having supplied supporting evidence of statements made by Lyft, Inc. employees.

Plaintiff Brown alleges that Defendant TRS Recovery Services, Inc., under direction of Defendant Fiserv, Inc., then contacted him via postal mail on 31 July 2022 regarding a debt of one-hundred eighty-five dollars owed to Lyft, Inc with ID 44-222084425059. The letter sent on 31 July indicated that Defendants would stop collection on the amount until information proving the debt's validity was supplied, provided that Plaintiff submitted a dispute before 14 September 2022. Plaintiff claims to have filed a dispute before 14 September via the website noted on the letter, which included a note requesting that he not be contacted by Defendant and advising that Defendant TRS Recovery Services, Inc. contact his bank, USAA, for evidence supporting his claims in the dispute.

Despite requesting that he not be contacted, Plaintiff was sent a letter (in violation of federal law) by Defendant TRS Recovery Services, Inc. on 21 September 2022 refusing to investigate the claim (in violation of federal law), instead requesting that Plaintiff fill out and submit an attached Forgery/Identity Theft declaration form, which Plaintiff never submitted, believing that parts of it were irrelevant to the claims made in the dispute. Additionally, the letter sent on 21 September listed an additional debt of one-hundred eighty-five dollars with ID 44-222154425062 and Defendant TeleCheck Services, Inc. (TeleCheck Services LLC) as the current creditor. Plaintiff was never sent a letter informing him of debt 44-222154425062, nor of any options to dispute or resolve it, in violation of federal law.

Plaintiff Brown complains of Defendants for alleged violations of 15 U.S.C § 1692 (the Fair Debt Collection Practices Act) and requests that the Court order relief of one-thousand dollars, from each defendant, for each violation, plus two-thousand dollars from Defendants for lost time and mental stress caused by Plaintiff's efforts to resist Defendants' collection by unlawful means of a debt that never existed, with requested relief totaling eleven-thousand dollars (\$11,000). Attached to the complaint is supporting evidence to Plaintiff's claims against Defendants.

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C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

See attached page, also an injunction ordering that
Defendants drop Plaintiff's debt collection

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 11th day of October 2022.

Respectfully Submitted,

Steven R

Signature of Plaintiff

(917) 694 - 2069

Plaintiff's Telephone Number

sohcahtoa @ mail . uk

Plaintiff's Email Address

211 Grant Ave Rm 203-A

Morgantown, WV 26505 - 4933

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.